

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION

A1 PROCUREMENT, LLC,

Relator,

v.

Civil Action No. 15-cv-00015  
(Smith, J.)(Leonard, M.J.)

THERMCOR, INC;  
WALTER L. DIXON;  
RONALD L. DIXON  
WILLIAM M. BOLEAN;  
TIMOTHY BOLEAN;  
DALE BARNES;  
TLMG, LLC;  
JOHN DOES 1-10,

Defendants.

**MOTION FOR DERRICK STORMS TO WITHDRAW AS COUNSEL**

1. Derrick Storms, Esq. is counsel for the Relator, A1 Procurement, LLC in this qui tam false claims act action.
2. Derrick Storms believes that the Defendants have turned the focus of this litigation into attacking Derrick Storms' character.
3. Derrick Storms feels that his ability to represent the Relator's and government's interest has been jeopardized by the Defendant's litigation tactics.
4. Derrick Storms respectfully requests to be relieved as counsel in this action.

Dated: December 18, 2015

Respectfully submitted,

/s/ Derrick Storms  
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*Attorneys for Relator*

### **CERTIFICATE OF SERVICE**

I hereby certify that on December 18, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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And I hereby certify that that there are no non-filing users.

/s/ Erik Cox  
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